



March 2, 2026

The Honorable Nicholas Kent
Under Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Document ID ED-2025-OPE-0944-0001 Reimagining and Improving Student Education

Submitted electronically via <http://www.regulations.gov>

Dear Under Secretary Kent:

Trinity Health appreciates the opportunity to comment on the policies set forth in the Reimagining and Improving Student Education (RISE) proposed rule. Our comments reflect a strong interest in public policies that support better health, better care and lower costs to ensure affordable, high quality, and people-centered care for all. We urge the department to reconsider the overly restrictive definition of “professional degree program” and ensure all post-baccalaureate health professionals maintain access to the loans needed to complete their courses of study.

Trinity Health is one of the largest not-for-profit, Catholic health care systems in the nation. It is a family of 127,000 colleagues and more than 29,000 physicians and clinicians caring for diverse communities across 25 states. Nationally recognized for care and experience, the Trinity Health system includes 92 hospitals, 101 continuing care locations, the second largest PACE program in the country (a total cost of care program), 121 urgent care locations and many other health and well-being services. Trinity Health has 15 medical groups with 8,200 medical group physicians and providers. Based in Livonia, Michigan, its annual operating revenue is \$25.4 billion with \$1.4 billion returned to its communities in the form of charity care and other community benefit programs.

Beginning July 1, 2026, students enrolled in graduate degree programs will be limited to annual loans of \$20,500, with an aggregate limit of \$100,000 for a program of study. Students enrolled in professional degree programs will be permitted to borrow up to \$50,000 per year, with an aggregate cap of \$200,000. The Department of Education was directed to define which professional and graduate degree programs are eligible for these loans in regulation. Trinity Health is concerned that the Department of Education’s proposed definition of “professional degree program” does not include a range of health care post-baccalaureate degree programs — including nursing, physician assistants, physical therapists, among others. If the narrower proposed definition were adopted by the department, this would deter potential students from pursuing these important degrees, with ripple effects felt across the health care field.

It is essential to ensure that hospitals and health systems have a pipeline of highly trained health care professionals to serve patients and communities. Doctors work together with nurses, physician assistants, social workers, physical and occupational therapists, respiratory therapists and other fundamental members of the care team to provide high-quality, comprehensive, person-centered care. Demand for these advanced practice clinical providers is only increasing as health care workforce shortages persist.

If the department limits its professional degree definition to the fields contained in the RISE Committee’s recommendation, students seeking degrees in a number of health care specialties would be subject to lower

annual and aggregate caps on federal student loans and higher out-of-pocket costs. They may be forced to rely on a patchwork of private loans at significantly higher interest rates or forgo advanced schooling altogether. For many, this financial burden would make enrollment in advanced practice programs unattainable, as they may be unable to afford tuition and living expenses without reliable or affordable loan options. A decline in enrollment would narrow the supply of clinicians who provide essential health care services. A reduced health care workforce pipeline could mean longer wait times for patients, delayed diagnoses and increased emergency visits, straining health systems, particularly in rural and underserved areas. Ongoing shortages will continue to drive up salaries which contribute to escalating health care costs.

Not only does the change in professional degree definition impact our clinicians, it impacts faculty members working at colleges and universities who are also required to have advanced clinical degrees. This change will further limit the availability of clinical faculty who teach in undergraduate programs that educate registered nurses, radiology techs, lab techs etc. Faculty shortages are already a challenge and limit the number of qualified students that can be admitted to undergraduate programs. Over the past few years, applications to colleges of nursing have been on the rise. Qualified candidates are turned away every year further compounding the shortage.

Trinity Health appreciates your consideration of these issues. **We urge the department to reconsider the overly restrictive definition and ensure all post-baccalaureate health professionals maintain access to the loans needed to complete their courses of study.** Please feel free to contact Jennifer Nading, Director of Policy and Regulatory Affairs, at jennifer.nading@trinity-health.org with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Peggy Norton-Rosko". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Peggy Norton-Rosko
Senior Vice President & Chief Nursing Officer
Trinity Health